

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

OSCAR RUBEN APAC	§	
	§	CIVIL ACTION NO. 3:24-cv-00123-KC
Plaintiff	§	
	§	
VS.	§	
	§	
CRISAFULLI GROUP LLC	§	
	§	
Defendant	§	

PLAINTIFF'S INITIAL DISCLOSURES

PLAINTIFF, by and through his attorney, brings these disclosures pursuant to the Federal Rule of Civil Procedure 26(a)(1).

Plaintiff respectfully submits the following initial disclosures:

1. **Witnesses.** The name, address, and telephone number of each individual likely to have discoverable information that may support the claims, and the information they possess:

Name of Individual Likely to have Discoverable Information	Contact Information (Address and Telephone Number)	Subject Matter of Discoverable Information
OSCAR RUBEN APAC	c/o	Plaintiff – can describe what barriers to entry he encountered when he visited Defendant's property
Corporate Representative	c/o Defense Counsel	Can detail who owns, manages, controls, and operates the property
Property Owner	c/o Defense Counsel	Can describe how much property is worth, his current net worth, can provide tax returns and

		financial statements to show remediations are readily achievable
Property Inspector/ Engineer	c/o Defense Counsel	Can detail the last time the property was checked for occupancy limit, fire extinguishers, asbestos, compliance with city and state rules and regulations

2. **Documents and things.** Copies, or descriptions by category and location, of all documents or things Plaintiff has in his possession or control that may be used to support Plaintiff's claims:

Category of Document, Electronically Stored Information, or Tangible Thing	Location
Federal Disability Rating	Plaintiff's possession

3. **Damages, Costs, and Fees Computation.**

Plaintiff will provide a computation based on the projected remediation costs, engineer's inspection, and other statutory costs the Plaintiff may be awarded.

4. **Liability Insurance.** Not applicable as to Plaintiff.

DATED: June 4, 2024

Respectfully submitted,

By: /s/ R. Bruce Tharpe
R. Bruce Tharpe

**LAW OFFICE OF
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ATTORNEY OF RECORD FOR
PLAINTIFF OSCAR RUBEN APAC

CERTIFICATE OF SERVICE

I, R. BRUCE THARPE, do hereby certify that on June 4, 2024, I emailed and/or sent by regular mail a copy of these Initial Disclosures to the Defendant's attorney at the following address:

Mr. Michael Hirsh
LOPEZ MOLINAR & HIRSH, PLLC
310 N. Mesa Street, Suite 900
El Paso, Texas 79901

I also certify that this Motion was served on all parties of record via the SDTX_USDC electronic case filing system.

/s/ R. Bruce Tharpe

R. BRUCE THARPE,
ATTORNEY OF RECORD FOR
PLAINTIFF OSCAR RUBEN APAC